

Message

From: Mili Patel [mili_patel@tcenergy.com]
Sent: 9/16/2019 4:34:40 PM
To: Marsh, Karen [Marsh.Karen@epa.gov]
Subject: RE: OOOOa Reporting Deadline

Just to confirm an example. If we have a unit that has a startup date of 8/17/18 does the logic below work?

	startup	Compliance period starts	Compliance period ends	Report due
Report 1	8/17/2018	8/2/2018	8/2/2019	10/31/2019
Report 2		8/2/2019	8/2/2020	10/31/2020
Report 3		8/2/2020	8/2/2021	10/31/2021
Report 4		8/2/2021	8/2/2020	10/31/2020
Report 5		8/2/2022	8/2/2023	10/31/2023
Report 6		8/2/2023	8/2/2020	10/31/2020

Mili Patel
US Environment – Air Compliance
Environment, Land & Indigenous Relations (EL&IR)

Desk: 832.320.5895 Mobile: 832.954.4875
[TCEnergy.com](mailto:mili_patel@tcenergy.com)

From: Marsh, Karen [mailto:Marsh.Karen@epa.gov]
Sent: Friday, September 13, 2019 8:38 AM
To: Mili Patel <mili_patel@tcenergy.com>
Subject: [EXTERNAL] RE: OOOOa Reporting Deadline

Hi Mili,

NSPS OOOOa allows you to use a common reporting schedule provided that schedules does not extend beyond the 12 month reporting period. It is acceptable to use the August 2nd compliance period, but I suggest that you review the startup dates and reporting deadlines carefully to ensure that all sites are within the 12 month reporting period with that compliance period.

I would encourage you to reach out to the delegated authority or appropriate region regarding your Title V reporting question. If you need help identifying the appropriate person, you can check the list in our small entity compliance guide. Though this guide is a bit out dated, it still provides some very useful information and contacts.

<https://www.epa.gov/sites/production/files/2016-08/documents/2016-compliance-guide-oil-natural-gas-emissions.pdf>

Let me know if you have any additional questions.
Karen

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05
Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Mili Patel <mili_patel@tcenergy.com>
Sent: Thursday, September 05, 2019 2:39 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: OOOOa Reporting Deadline

Karen –

I wanted to follow up with you regarding the annual reporting deadline for OOOOa. As I understand it, the compliance period is

“The initial compliance period begins on August 2, 2016, or upon initial startup, whichever is later, and ends no later than 1 year after the initial startup date for your affected facility or no later than 1 year after August 2, 2016”

We have several new OOOOa that started from between 10/16/17 and 12/27/18. Last years reporting we utilized the start up dates to determine the report deadline. Now with so many more units that started up I want to try and simplify that. I wanted to see if it was acceptable to use the August 2nd compliance period from the rule and have all of our reports due by 10/31 each year. If we use this logic our reporting period is 8/2/18 – 8/2/19 with reports due 10/31/19.

Another question is can we include the OOOOa with our Title V Annual Compliance Reports instead of separately?

Thanks.

Mili Patel
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From: Andrew Woerner <Andrew.Woerner@erm.com>
Sent: Thursday, September 5, 2019 1:17 PM
To: Mili Patel <mili_patel@tcenergy.com>
Cc: Grant Morgan <Grant.Morgan@erm.com>
Subject: [EXTERNAL] Karen Marsh Contact Information

Hi Mili –

Good to connect today..

Karen Marsh is the current lead for OOOOa (reconsideration process) at EPA. She can probably confirm our discussion about reporting timelines under the rule and / or direct you appropriately.

Her contact information is below:

Karen R. Marsh, PE
US EPA, OAQPS, Sectors Policies and Programs Division
Fuels and Incineration Group
109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711
Direct: (919) 541-1065; email: marsh.karen@epa.gov

You can also have a look at Section 1.4.3 of this EPA guidance document on the rule...

<https://www.epa.gov/sites/production/files/2016-08/documents/2016-compliance-guide-oil-natural-gas-emissions.pdf>

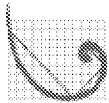
I think it's pretty clear that you are able to cluster reports so long as you don't have a site go past its own "initial compliance period", which you would not if you are sweeping up everything annually.

Thanks,

Andy Woerner
Partner

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